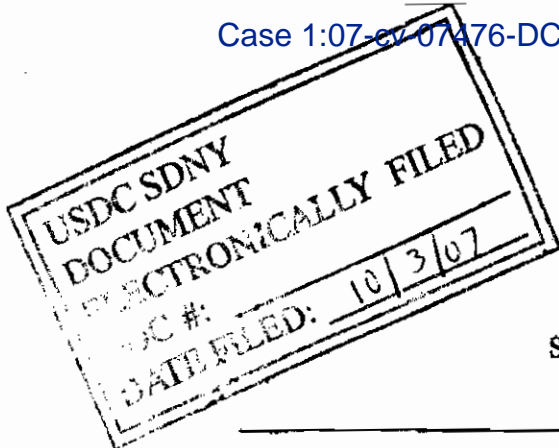


Corwin, J



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AUDREY DANG, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

GPC BIOTECH AG, BERND SEIZINGER, M.D.,
PH.D., MARTINE GEORGE, M.D., and MARCEL
ROSENCZWEIG, M.D.,

Defendants.

Civil Action No. 07-CV-7476 (DC)

**STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME TO
RESPOND TO COMPLAINT**

WHEREAS, plaintiff Audrey Dang has filed the captioned putative class action;

WHEREAS, plaintiffs in actions entitled *Corwin v. Seizinger, et al.*, No. 07-cv-6728 (DC) and *Temesfor v. GPC Biotech AG, et al.*, No. 07-cv-7061 (DC) (collectively with the Dang action, the "Actions"), also have filed putative class actions arising out of the same alleged facts and circumstances as those alleged by Dang in this action;

WHEREAS, it is anticipated that plaintiffs in the Actions will move, pursuant to the Private Securities Litigation Reform Act, for the appointment of lead plaintiff and the selection of lead plaintiff's counsel; and

WHEREAS, it is anticipated that following the appointment of lead plaintiff and selection of lead plaintiff's counsel, an amended complaint will be filed relating to the Actions;

IT IS HEREBY STIPULATED AND AGREED, by and among counsel for the plaintiff and counsel for Defendants GPC Biotech AG, Bernd R. Seizinger, Martine George, and Marcel Rosenczweig (collectively, the "Defendants"), that:

1. The undersigned attorneys for the Defendants agree to accept service of process on behalf of all Defendants, provided, however, that such service shall not constitute a

waiver of any defenses that may be raised by motion pursuant to Fed. R. Civ. P. 12(b)(1)-(3) and (6)-(7).

2. The time of the Defendants to move, answer, or otherwise respond to the complaint filed in this action is adjourned to a date to be set either by order of the Court or further stipulation of the parties.

3. Within ten days following appointment of the lead plaintiff and designation of lead counsel by the Court, the parties shall submit to the Court for its approval a stipulation regarding the schedule for filing an amended complaint and Defendants' response to such amended complaint, provided, however, that Defendants' response shall not be due to be served in fewer than 60 days following service of the amended complaint.

Dated: New York, New York
September 7, 2007

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Attorneys for Plaintiff Audrey Dang

SO ORDERED
this 10 day of September, 2007



Hon. Denny Chin, U.S.D.J.